



February 23, 2009

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual CPNI Compliance Certification, EB Docket No. 06-36

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36 please find the Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certificate and accompanying statement of WaveDivision Holdings, LLC ("Wave") on behalf of each Wave subsidiary telecommunications carrier: WaveDivision I, LLC, WaveDivision II, LLC, WaveDivision III, LLC, Cedar Communications, LLC, WaveDivision IV, LLC, Wave/Powers Acquisition, LLC, WaveDivision VI, LLC, Astound Broadband, LLC, and WaveDivision VII, LLC.

If there are questions regarding this filing, please contact me.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read 'James A. Penney', is written over the typed name.

James A. Penney
Executive Vice President
Business and Legal Affairs

Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 23, 2009

Name of company covered by this certification: WaveDivision Holdings, LLC (“Wave”) on behalf of its subsidiaries WaveDivision I, LLC, WaveDivision II, LLC, WaveDivision III, LLC, Cedar Communications, LLC, WaveDivision IV, LLC, Wave/Powers Acquisition, LLC, WaveDivision VI, LLC, Astound Broadband, LLC, and WaveDivision VII, LLC (collectively the “Wave Subsidiaries”).

Form 499 Filer ID: WaveDivision I, LLC - 826028
WaveDivision II, LLC - 826028
WaveDivision III, LLC - 826028
Cedar Communications, LLC - 826028
WaveDivision IV, LLC - 826028
Wave/Powers Acquisition, LLC - 826028
WaveDivision VI, LLC - 826028
Astound Broadband, LLC - 825683
WaveDivision VII, LLC - 826028

Name of signatory: James A. Penney

Title of signatory: Executive Vice President, Business and Legal Affairs

I, James A. Penney, certify that I am an officer of the companies named above (i.e., Wave and each of the Wave Subsidiaries) and acting as an agent of Wave and the Wave Subsidiaries, that I have personal knowledge that Wave has established operating procedures that are adequate to ensure compliance by the Wave Subsidiaries with the Commission’s CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.* Wave’s operating procedures are utilized by each of the Wave Subsidiaries, and all Wave policies and procedures are henceforth deemed to be the policies and procedures of any and all Wave Subsidiaries.

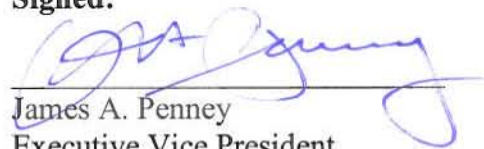
Attached to this certification is an accompanying statement explaining how the Wave Subsidiaries are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission’s rules.

Neither Wave nor any of the Wave Subsidiaries have taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. Because Wave is not aware of any activity by data brokers or pretexters with respect to the Wave Subsidiaries’ customers’ CPNI during the reporting year, Wave has no information to report with respect to the processes pretexters are using to attempt to access CPNI. Wave is aware that companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and

what steps companies are taking to protect CPNI. Wave's steps taken to protect CPNI are described in the accompanying statement.

Neither Wave nor any of the Wave Subsidiaries have received any customer complaints in the past year concerning unauthorized release of CPNI.

Signed:



James A. Penney

Executive Vice President

Business and Legal Affairs

WaveDivision Holdings, LLC

WaveDivision I, LLC

WaveDivision II, LLC

WaveDivision III, LLC

Cedar Communications, LLC

WaveDivision IV, LLC

Wave/Powers Acquisition, LLC

WaveDivision VI, LLC

Astound Broadband, LLC

WaveDivision VII, LLC

Attachment to Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification

EB Docket No. 06-36

Statement Regarding CPNI Operating Procedures

Wave's CPNI Operating Procedures ensure that Wave and the Wave Subsidiaries are and will be in compliance with 47 U.S.C. 222 and the rules contained in Title 47, Chapter 1, Subchapter B. Part 64, Subpart U of the Code of Federal Regulations, 47 C.F.R. § 64.2001 *et seq.* of the commission's rules. All of Wave's CPNI Operating Procedures are the Operating Procedures of any and all Wave Subsidiaries. Included among the provisions of Wave's CPNI Operating Procedures are:

- A requirement that Wave have at all times a CPNI Compliance Officer to supervise the implementation of Wave's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI, in compliance with § 64.2010.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI, in compliance with § 64.2007. In those instances in which customer approval is required for use of CPNI, Wave obtains approval through oral, written, or electronic methods in compliance with § 64.2007.
- Detailed procedures for obtaining opt-out and opt-in approval from customers. For one-time use of CPNI on inbound and outbound customer telephone contacts for the duration of the call, Wave representatives obtain oral consent from the customer pursuant to the Commission's rules.
- A requirement that the billing system records for customers' accounts allow the status of customers' CPNI approval to be easily ascertained prior to the use of CPNI, in compliance with § 64.2009.
- A requirement for supervisory approval for all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns, in compliance with § 64.2009.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI, in compliance with § 64.2009.
- A written disciplinary process for misuse of CPNI, in compliance with § 64.2009.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI, in compliance with § 64.2011.

Wave and the Wave Subsidiaries were not required to take action against any data brokers in 2008, nor did Wave or any of the Wave Subsidiaries receive any customer complaints based on unauthorized release of CPNI in 2008.